

REMARKS/ARGUMENTS

Various claims are being amended as shown above. The claim amendments clarify the claim language and are not intended to limit the scope of the claims, unless the claim language is expressly quoted in the following remarks to distinguish over the cited art. No new matter is being added by virtue of the amendment to the claims.

In the office action, claims 1-7, 21-28, 37-55, 58-65, 68, 71-76, and 77-80 were rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over the Applicants' admitted prior art (AAPA) of this application in view of Tokunoh, et al. (U.S. Patent No. 5,543,363) and Yang, et al. (U.S. Patent No. 6,409,902 B1). Applicants respectfully traverse the rejection.

The Examiner correctly admits in the office action that AAPA does not specifically disclose that the bolster plate is a pre-curved bolster plate that has a radius of curvature where the radius is pre-calculated by a method as recited in the claims, and that AAPA and Tokunoh does not explicitly disclose that the radius is pre-calculated by a method as recited in the claims. In an attempt to overcome the deficiency of AAPA, the Examiner relies on Tokunoh and Yang in an attempt to show various features.

Tokunoh is directed to a semiconductor device 1 that is fixed to a holder 21. Tokunoh does not disclose a substrate and does not disclose the step of bolting a pre-curved bolster plate to the substrate and to a clamp that is coupled to a component so that the final radius on the pre-curved bolster plate is eliminated and the pre-curved bolster plate is deflected into a flat plate that is in

complete contact with the substrate, as recited in the claims. Instead, Tokunoh discloses a curved plate spring 24 that is bolted by bolts 23 to an end plate 22 which is not a substrate. Furthermore, Tokunoh instead discloses the curved plate spring 24 that is in partial contact (see, Tokunoh Figure 3) with a protective disc 26b which is not a substrate. Therefore, Tokunoh teaches away from the elements recited in the claims because Tokunoh discloses a curved plate spring 24 that is bolted by bolts 23 to a non-substrate and the curved plate spring 24 is not in complete contact with a substrate. Since Tokunoh teaches away from the elements recited in the claims, the AAPA-Tokunoh-Yang combination is improper.

Yang is directed to a method of determining the design parameters for a tool to be formed (e.g., part 44 in Figure 8 of Yang). However, Yang does not disclose a method that includes the step of estimating an initial radius of curvature of a pre-curved bolster plate based on a uniform load from a clamping force to be applied on a component that will be attached to the substrate, and does not further disclose the step of determining a final radius of curvature of the pre-curved bolster plate by use of a FEA software where the initial radius is modified into the final radius, as recited in the claims. Yang also does not disclose the step of cutting the pre-curved bolster plate according to the selected set of physical dimensions for the pre-curved bolster plate. Instead, Yang uses an FEA algorithm (step 48 in Figure 3 of Yang) that calculates the deformation caused by electroforming stress. The wall thickness of the tool to be formed is increased so that the

deformation is smaller than the accuracy requirement of the tool to be formed. Furthermore, Yang does not disclose and does not suggest the step of bolting a pre-curved bolster plate to a substrate and to a clamp so that the final radius on the pre-curved bolster plate is eliminated and the pre-curved bolster plate is deflected into the flat plate that is in complete contact with the substrate, as recited in the claims. Yang merely discloses a tool (part 44) that is formed to minimize distortion due to electroforming stress.

Therefore, the AAPA-Tokunoh-Yang combination does not disclose the features recited in the independent claims. Furthermore, as discussed above, the AAPA-Tokunoh-Yang combination is improper because Tokunoh teaches away from the features recited in the claims.

Various claims depend from one of claims 1, 21, 37, and 46, and are each patentable over the AAPA-Tokunoh-Yang combination for at least the same reasons that the respective base claims are is patentable over the cited references, considered singly or in combination. Furthermore, each of the dependent claims distinguishes over the AAPA-Tokunoh-Yang combination by reciting additional features that are not disclosed in the AAPA-Tokunoh-Yang combination. For example, claim 77 recites various steps that are not disclosed by the AAPA-Tokunoh-Yang combination.

Accordingly, each of the claims 1-7, 21-28, 37-55, 58-65, 68, 71-76, and 77-80 is patentable over the AAPA-Tokunoh-Yang combination.

For the above reasons, Applicants request reconsideration and withdrawal of the rejection under 35 U.S.C. §103.

For the above reasons, Applicants respectfully request allowance of all pending claims.

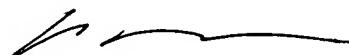
If the undersigned attorney has overlooked a teaching in any of the cited references that is relevant to the allowability of the claims, the Examiner is respectfully requested to specifically point out where such teachings may be found.

CONTACT INFORMATION

If the Examiner has any questions or needs any additional information, the Examiner is invited to telephone the undersigned attorney at (805) 681-5078.

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Respectfully submitted,
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